

the “Debtors”), and file this Motion to enter their proposed order on their Motion to Compel Discovery Responses from DMA Properties, Inc. (“DMA”), Frank Daniel Moore (“Moore”), and Longbranch Energy, LP (“Longbranch”) (the “Motion”), and would respectfully show as follows:

1. On December 22, 2020, the Court held an expedited hearing on the Motion.
2. Upon granting relief, the Court Ordered Debtors to file a proposed order.
3. Debtors have sought to confer with counsel for DMA, Moore, and Longbranch about the proposed order. However, upon such conference the parties were unable to agree about the substance of the Court’s order, including but not limited to whether it was stipulated that George Pigg did not represent Black Duck in drafting the Longbranch Assignment, whether Moore was to be presented for his redeposition on January 5 or 6, 2021, or whether Moore was required to make his phone and text messages available at the time of his deposition.
4. Debtors now file their proposed order as Exhibit A to this motion.

WHEREFORE PREMISES CONSIDERED Debtors pray that this Court enter the order attached hereto as Exhibit A, and for such further relief as the Court may deemed them justly entitled.

Dated: January 5, 2020.

Signature on following page.

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller

C. John Muller IV

State Bar No. 24070306

john@muller-smeberg.com

Ezekiel J. Perez

State Bar No. 24096782

zeke@muller-smeberg.com

111 W. Sunset Rd.

San Antonio, TX 78209

Telephone: 210-664-5000

Facsimile: 210-598-7357

ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 5th day of January 2020:

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, Texas 78209
210-829-2022
210-829-2021 fax
mblack@burnsandblack.com
Attorneys for Longbranch Energy, LP
and DMA Properties, Inc.

Christopher S. Johns
Christen Mason Hebert
JOHNS & COUNSEL PLLC
14101 Highway 290 West, Suite
400A
Austin, Texas 78737
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com
chebert@johnsandcounsel.com

Timothy Cleveland
CLEVELAND | TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, Texas 78746
512-689-8698
tcleveland@clevelandterrazas.com
Attorneys for DMA Properties, Inc.

Natalie Wilson
LANGLEY & BANACK, INC.
745 East Mulberry Avenue | Suite 700
San Antonio, TX 78212
210-736-6600
lwilson@languleybanack.com
Attorneys for DMA Properties, Inc.

Jeffery Duke
DUKE BANISTER MILLER & MILLER
22310 Grand Corner Drive, Suite 110
Katy, Texas 77494
jduke@dbmmlaw.com
Counsel for Longbranch Energy, LP

William Germany
BAYNE, SNELL, & KRAUSE
1250 NE Loop 410, Ste. 725
San Antonio, Texas 78209
T- (210) 824-3278
F- (210) 824-3937
wgermany@bskaw.net
Attorney for Larry Wright

OFFICE OF THE UNITED STATES
TRUSTEE
903 San Jacinto Blvd, Room 230
Austin, Texas 78701
shane.p.tobin@usdoj.gov
United States Trustee

/s/ John Muller

C. John Muller IV